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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF RYAN K. SILA IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO GOOGLE'S MOTION
IN LIMINE 2 TO EXCLUDE EVIDENCE
AND ARGUMENT RE: CLASS-WIDE
DAMAGES AND CERTAIN OTHER
DAMAGES EVIDENE**

The Honorable Yvonne Gonzalez Rogers

DECLARATION OF RYAN K. SILA

I, Ryan K. Sila, declare as follows.

1. I am an associate with the law firm of Susman Godfrey LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and I have been admitted *pro hac vice* in this matter. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in connection with Plaintiffs' opposition to Google's Motion *In Limine* Number 2, to Exclude Evidence and Argument Regarding Class-Wide Damages and Certain Other Damages Evidence.

3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the deposition transcript of Plaintiff Chasom Brown, taken on January 13, 2022.

4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the deposition transcript of Michael J. Lasinski, taken on July 20, 2022.

5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the deposition transcript of Plaintiff Jeremy Davis, taken on January 7, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of October 2023, at New York, New York

/s/ Ryan Sila